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Attorney for Defendant Radius Solutions, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

KATHRYN LONG, individually and on
behalf of others similarly situated,

Plaintiff,

vs.

TORRES CREDIT SERVICES, INC. and
RADIUS SOLUTIONS, INC.,

Defendants.

) Case No. 2:13-cv-01531-APG-VCF

)
) **DEFENDANT, RADIUS SOLUTIONS,**
) **LLC'S, UNOPPOSED MOTION FOR**
) **EXTENSION OF TIME TO RESPOND TO**
) **PLAINTIFF'S FIRST AMENDED**
) **COMPLAINT**

Defendant, Radius Solutions, Inc. n/k/a Radius Solutions, LLC (Radius), through
counsel and under the Federal Rules of Civil procedure, files this Unopposed Motion for
an Extension of Time to Respond to Plaintiff's First Amended Complaint, and states:

Defendant Radius Solutions, LLC's Unopposed Motion for Extension

1 1. On December 23, 2013, plaintiff, Kathryn Long (plaintiff), served her
2 amended complaint and summons on Radius. Radius's responsive pleading is currently
3 due on January 13, 2014.
4

5 2. Undersigned counsel, however, requests additional time to review the file
6 materials, conduct an investigation and confer with his client in order to draft an
7 appropriate responsive pleading. In addition, the extension will allow the parties the
8 time necessary to engage in meaningful and good-faith settlement negotiations in hopes
9 the parties can reach a mutually agreeable resolution without the Court's involvement.
10

11 3. Plaintiff, through counsel, has agreed to allow Radius an extension of time
12 through and including January 31, 2014 to respond to the complaint.
13

14 WHEREFORE, Defendant, Radius Solutions, LLC, respectfully requests this
15 Court grant it an extension through and including January 31, 2014 to respond to the
16 complaint, and for such other relief as this Court deems proper.
17

18 Respectfully submitted this 13 day of January, 2014.
19

20 LINCOLN, GUSTAFSON & CERCOS

21 
22

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Attorney for Defendant,

Radius Solutions, LLC

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 1-14-2014

CERTIFICATE OF SERVICE

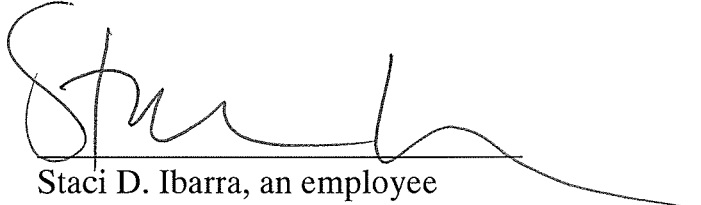
I certify that on this 13th day of January 2014, a copy of the foregoing was filed electronically in the ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system, including Plaintiff's counsel as described below. Parties may access this filing through the Court's system.

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